

April 11, 2022

Federal Aviation Administration  
U.S. Department of Transportation  
Docket Operations  
West Building Ground Floor, W12-140  
Washington, DC 20591-0001

Re: Exemption No. 17894A, as amended, Docket No. FAA-2018-0375

Dear Sir or Madame:

Polar Air Cargo request an extension to Exemption No. 17894A, which expires July 31, 2022. This is an exemption from 121.689(a)(6) of Title 14, Code of Federal Regulations (14 CFR). Section 121.689 prescribes, in pertinent part, that the flight release form for supplemental operations must list the minimum fuel supply in gallons or pounds.

The reasoning for our request is that our flight plans, aircraft fuel gauges and weight and balance system use kilograms as the unit of measure. By providing the minimum fuel supply on the release in kilograms, all fuel data related to flight will be in the same unit of measure, which will eliminate the possibility of the use of an improper fuel load. To do otherwise may conflict with our statutory duty as an air carrier to provide service with the highest possible degree of safety in the public interest.

Requiring fuel information in pounds when the aircraft fuel system, weight and balance system, and all fueling operations are done in kilograms introduces erroneous information into the system. This situation creates the risk of an aircraft taking off with incorrect fuel load. The listing of the minimum fuel supply on the release in a unit of measure that is consistent with the fuel system in the airplane decreases that risk and enhances safety.

We request that a finding of good cause be considered since the requested exemption would not set a precedent.

Sincerely,

*Michael A Giordano*

Michael A. Giordano  
Director Flight Operations Specifications & Regulatory Administration  
Polar Air Cargo  
Cc: Captain Chris Agnini  
Captain Scot Ridgway